#### **REMARKS**

Claims 35-52 are added herein. Claims 1-52 now remain pending in the application.

The Applicants respectfully request the Examiner to reconsider earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Amendment is respectfully requested.

#### Objection to the Specification

The specification was objected to as allegedly missing updated application information.

The specification is amended herein to update the application information. The Applicants respectfully request the objection to the specification be withdrawn.

### Claims 8, 10 and 29-32 over Gupta

In the Office Action, claims 8, 10 and 29-32 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,374,305 to Gupta et al. ("Gupta"). The Applicants respectfully traverse the rejection.

Claims 8 and 10 recite forwarding a packaged message to a backend server via a message router <u>over a non-IP protocol network</u> and receiving a response from a Web server <u>over the non-IP protocol network</u>. Claims 29-32 recite a mobile client device comprising a web browser and a redirector communicating with the web browser, the redirector packaging messages from the web browser into a fundamental non-IP network protocol.

Gupta appears to disclose a method and apparatus for dynamically inserting proxy servers into a network traffic path (Abstract). The client device access a server through a HTTP, IP, HTML and SGML protocols and languages (Gupta, col. 8, lines 57-64).

Thus, Gupta's invention is directed to providing alternate paths for a client device to access a server. However, the method of accessing the server is

conventional, i.e., accessing information from the server over an IP protocol network.

In contrast to Gutpa's conventional use of an IP protocol network for accessing information from a server, Applicants utilize a <u>non-IP protocol</u> <u>network</u> to access content from a server by a mobile client device and a wireless device, i.e., forwarding a packaged message to a back-end server via a message router <u>over a non-IP protocol network</u> and receiving a response from a Web server <u>over the non-IP protocol network</u>; and a mobile client device comprising a web browser and a redirector communicating with said web browser, the redirector packaging messages from the web browser into a <u>fundamental non-IP network protocol</u>, as respectively recited by claims 8, 10 and 29-32.

A benefit of accessing information from a mobile client <u>over a non-IP protocol network</u> and using <u>fundamental non-IP network protocol</u> is, e.g., reduced bandwidth requirements on a network. As Applicants discuss in the specification, browsing the Internet using a standard version of a conventional browser is not ideal in a wireless environment. Standard versions of browsers send HTTP requests over TCP/IP, which is a chatty LAN protocol. TCP/IP is not cost effective in terms of bandwidth usage in a wireless environment. Gupta fails to disclose <u>or suggest</u> solutions to problems particular to browsing the Internet over a <u>wireless environment</u> when using TCP/IP, such as the large bandwidth required.

Accordingly, for at least all the above reasons, claims 8, 10 and 29-32 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

# <u>Claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34 over Gupta in view of Aravamudhan</u>

In the Office Action, claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Gupta in view of U.S. Patent No. 6,563,919 to Aravamudhan et al. ("Aravamudhan"). The Applicants respectfully traverse the rejection.

Claims 33 and 34 are dependent on claims 29 and 8 respectively, and are allowable for at least the same reasons as claims 29 and 8.

Claims 1, 2 and 4-7 recite forwarding a packaged message from a mobile client device to a back-end server <u>over a non-IP protocol network</u>. Claims 13, 15-19 recite a method and apparatus a wireless device packaging a request with a protocol used by <u>a non-IP protocol wireless network</u>. Claim 34 recites forwarding a packaged message to a back-end server via a message router <u>over a non-IP protocol network</u> and receiving a response at a mobile client device from a Web server <u>over the non-IP protocol network</u>. Claim 33 recites a mobile client device comprising a web browser and a redirector communicating with the web browser, the redirector packaging messages from the web browser into a fundamental non-IP network protocol.

As discussed above, Gupta's invention is directed to providing alternate paths for a client device to access a server. However, the method of accessing the server is <u>conventional</u>, i.e., accessing information from the server <u>over an IP protocol network</u>. Gupta fails to disclose mobile and wireless utilizing <u>a non-IP protocol network</u> and a <u>fundamental non-IP network protocol</u>, as respectively recited by claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34.

The Office Action relies on Aravamudhan to allegedly make up for the deficiencies in Gupta to arrive at the claimed invention. The Applicants respectfully disagree.

Aravamudhan appears to disclose a unified mobility manager (UMM) 30 that unifies implementation and processing of mobile communications by various mobile system, such as cellular/mobile telephones, pagers, personal computers, PDAs, etc., that operate on difference communication protocols (Fig.

2; col. 6, lines 16-25). The UMM is capable of receiving messages for different networks, such as mobile IP (Aravamudhan, col. 6, lines 37-51). A mobile device sends a mobile IP message over a wireless network to a protocol gateway using mobile IP (Fig. 5; col. 9, lines 38). The protocol gateway converts a Network Specific Identity to a Network Non-specific Identity (Fig. 5; col. 9, lines 38).

Aravamudhan discloses a method and apparatus for allowing a plurality of devices using a plurality of protocols to use a centralized system for conversion to a generic format to access a Unified Directory Service (Fig. 5). A mobile IP device sends mobile IP protocol messages over a mobile IP protocol network for access to a Unified Directory Service (Aravamudhan, Fig. 5). Aravamudhan fails to disclose or suggest a wireless device and a mobile client device accessing a Web server and a back-end server over a non-IP protocol network and using a non-IP network protocol, as recited by claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34.

Thus, Aravamudhan, like Gupta, fails disclose <u>or suggest</u> solutions to problems particular to browsing the Internet over a <u>wireless environment</u> when using TCP/IP, such as the large bandwidth required.

Neither Gupta nor Aravamudhan, either alone or in combination, disclose, teach or suggest a method, a wireless device and a mobile client device accessing a back-end server over a <u>non-IP protocol network</u> and using a <u>non-IP network protocol</u>, as recited by claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34.

Accordingly, for at least all the above reasons, claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

ZOMBEK et al. - Appln. No. 09/698,181

## **Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted, MANELLI DENISON & SELTER PLLC

William H. Bollman Reg. No.: 36,457 Tel. (202) 261-1020 Fax. (202) 887-0336

2000 M Street, N.W. 7<sup>th</sup> Floor Washington D.C. 20036-3307

WHB/df